

**UNITED STATES DISTRICT COURT**  
 for the  
 District of Massachusetts

|   |   |                |
|---|---|----------------|
| United States of America                    | ) |                |
| v.  | ) |                |
| (1) Erison Jose CUELLO-NUNEZ,               | ) | Case No.       |
| (2) [REDACTED], (3) Roberto Toledo          | ) | 23-MJ-5049-JGD |
| SANCHEZ, (4) Wander Ernesto CUELLO, and (5) | ) |                |
| FNU LNU, a/k/a "JOSE"                       | ) |                |
| <i>Defendant(s)</i>                         |   |                |

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2022 in the county of Suffolk in the  
 District of Massachusetts, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i>   |
|---------------------|--|
| 21 U.S.C. §846      | Conspiracy to distribute and possess with intent to distribute controlled substances, including 50 grams or more of methamphetamine, a schedule I controlled substance and 400 grams or more of fentanyl, a Schedule II controlled substance |

This criminal complaint is based on these facts:

See Affidavit of DEA Special Agent Sean Geary

Continued on the attached sheet.

  
 Complainant's signature

Sean Geary, DEA Special Agent

Printed name and title

Telephonically

Sworn to before me and signed in my presence.

Date: Feb 6, 2023

  
 Judge's signature

Judith Dein U.S. Magistrate Judge

Printed name and title

City and state: Boston, Massachusetts